



South Coast Air Quality Management District

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FAXED: March 10, 2005

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Ms. Rocio Lopez, Associate Planner
City of Carson
Planning Division
701 E. Carson Street
P.O. Box 6234
Carson, CA 90749

**Negative Declaration for the Proposed Carson Toyota Dealership (Design Overlay
Review No. 04-03-848; CUP No. 04-03-570 and Variance No. 467-05)**

The South Coast Air Quality Management District (SCAQMD) appreciates the opportunity to comment on the above-mentioned document. The following comments are meant as guidance for the Lead Agency and should be incorporated into the Final Negative Declaration.

Please provide the SCAQMD with written responses to all comments contained herein prior to the adoption of the Final Negative Declaration. The SCAQMD staff would be happy to work with the Lead Agency to address these issues and any other questions that may arise. Please contact Gordon Mize, Air Quality Specialist – CEQA Section, at (909) 396-3302, if you have any questions regarding these comments.

Sincerely,

Steve Smith, Ph.D.
Program Supervisor, CEQA Section
Planning, Rule Development & Area Sources

SS:GM

Attachment

LAC050216-01
Control Number

**Negative Declaration for the Proposed Carson Toyota Dealership (Design Overlay
Review No. 04-03-848; CUP No. 04-03-570 and Variance No. 467-05)**

1. The lead agency has concluded on page 6 in Section III. Air Quality of the Draft Negative Declaration (Draft ND) that the proposed project will have less than significant air quality impacts. The lead agency did not, however, support its conclusion by quantifying the proposed project's construction and operational air quality impacts. This is important because although the proposed construction activities are temporary in nature, residences are described as being less than one quarter mile from the proposed site and therefore may be exposed to emissions from fugitive dust, off- and on-road vehicles and equipment, architectural coatings and other emission sources listed in the project description. The SCAQMD therefore recommends that for this current project and for future projects that the lead agency quantify short- and long-term air quality impacts.

To quantify air quality impacts, the lead agency can utilize the current CARB URBEMIS 2002 emissions model, which can be accessed at <http://www.arb.ca.gov/planning/urbemis/urbemis2002/urbemis2002.htm> or follow the calculation methodologies in Chapter 9 and the Appendix to Chapter 9 in the South Coast AQMD's CEQA Air Quality Handbook.

In the event that quantification of the air quality impacts from the proposed project, either construction and/or operational, exceed established significance thresholds, mitigation measures may be necessary. In addition to identifying feasible mitigation measures, the lead agency should specify the control efficiency of each mitigation measure (if one is available) and apply the control efficiency to the total emissions estimated for the project. In this way the lead agency can quantitatively determine the significance of air quality impacts from the proposed project.

2. The traffic discussion on page 19 indicates that the City's Traffic Engineer "conducted a review of Addendum 2 and the General Plan" adopted in October 2004. This information does not indicate if the traffic studies were updated or the Addendum relied on the old 1996 FEIR data. In any event, the discussion indicates that there is an increase in traffic generated by the proposed project. Increased traffic and associated congestion could adversely affect local air quality. As a result, a CO hotspots analysis may be warranted. The SCAQMD recommends a CO hotspots analysis if the level of service (LOS) degrades from C to D or if the vehicle to capacity ration increases by two percent for intersections rated D or worse.

Negative Declaration for the Proposed 9.35-acre Carson Toyota Dealership (Design Overlay Review No. 04-03-848; CUP No. 04-03-570 and Variance No. 467-05)

In addition, the Draft ND did not discuss which of the infrastructure improvements alluded to on page 19 in Section XV. Transportation/Traffic were adopted and what impacts those improvements had on local traffic volumes. The Final ND should include those measures affects to the traffic levels of service and volumes to capacity levels to further document that traffic impacts resulting from the anticipated increases in traffic resulting from the proposed expansion will not have significant local CO impacts.

3. In the Final ND, the lead agency should discuss the influence of complying with SCAQMD Rule 403 – Fugitive Dust and Rule 402 – Nuisance.
4. Automobile dealerships often have gasoline dispensing equipment. It is recommended that the lead agency clarify whether or not the proposed project includes gasoline storage tanks and dispensing equipment. If so, the lead agency should cite compliance with SCAQMD Rule 461 - Gasoline Transfer and Dispensing in the Final ND.
5. If coating for touch up or cleaning solvents will be used while vehicles are repaired, the lead agency should cite compliance with SCAQMD Rule 1151 – Motor Vehicle and Mobile Equipment Non-Assembly Line Coating Operations and Rule 1171 – Solvent Cleaning Operations in he Final ND.
6. If the proposed project includes gasoline dispensing equipment or spray booths for touch-up and repair, then it is subject to discretionary permit approval by the SCAQMD. Without quantitative analysis of environmental impacts for the proposed project, the ND is not adequate for the purposes of subsequent discretionary approvals by the SCAQMD. Further, the SCAQMD may pursue the actions identified in CEQA § 15096(e) to ensure that a quantitative analysis is prepared for the proposed project.